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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

FINJAN, INC., a Delaware Corporation,

Plaintiff,

v.

CISCO SYSTEMS, INC., a California
Corporation,

Defendant.

Case No.: 5:17-cv-00072-BLF-SVK

**DECLARATION OF NICOLE E. GRIGG
IN SUPPORT OF CISCO SYSTEMS,
INC.'S ADMINISTRATIVE MOTION TO
FILE DOCUMENTS UNDER SEAL**

I, Nicole E. Grigg, declare as follows:

1. I am an associate at the law firm of Duane Morris LLP and am counsel for Defendant Cisco Systems, Inc. ("Cisco"). I have personal knowledge of the matters set forth in this Declaration, and if called as a witness, could and would testify competently to such facts under oath. I submit this Declaration in support of Cisco's Administrative Motion to File Documents Under Seal pursuant to Civil L.R. 79-5(e). In making this Declaration, it is not my intention, nor the intention of Cisco, to waive the attorney-client privilege, the attorney work-product immunity, or any other applicable privilege.

2. I have reviewed the following documents and confirmed that they consist of confidential personal information regarding Cisco's employees as well as confidential internal Cisco information.

Dkt. No.	Document	Portion(s) to Seal	Reason(s) for Sealing
	Cisco's Notice Re the Impact of the COVID-19 Pandemic on the June 1 Trial Date	Highlighted portions at: page 2 line 23- page 3 line 2; page 3 line 16; page 3 line 18 – page 4 line 6; page 4 line 13 - 24	The highlighted information contains confidential personal information regarding Cisco's employees as well as confidential internal Cisco information with respect to COVID-19 that should not be publicly available and would cause harm to Cisco and its employees if disclosed.
	Declaration of Nicole E. Grigg in Support Cisco's Notice Re the Impact of the COVID-19 Pandemic on the June 1 Trial Date	Highlighted portions at: page 1 line 10 – 18; page 1 line 27 – page 2 line 4; page 2 line 7 - 20	The highlighted information contains confidential personal information regarding Cisco's employees as well as confidential internal Cisco information with respect to COVID-19 that should not be publicly available and would cause harm to Cisco and its employees if disclosed.

3. Good cause exists to seal the portions of the documents identified in the chart above for the reasons stated therein. Cisco seeks to seal only those portions of the documents that contain

1 “sealable” information, as defined in Civil Local Rule 79-5(d), and for which it has good cause to
2 seal.

3 4. I am informed and believe that, if filed publicly, this confidential information relates
4 to personal information of its employees that should not be disclosed and could be used by Cisco’s
5 competitors to Cisco’s disadvantage, as it relates to Cisco’s business policies and corporate structure,
6 which, if disclosed, could result in competitive harm to Cisco.

7 I declare under penalty of perjury under the laws of California and the United States that the
8 foregoing is true and correct.

9 Executed on April 28, 2020, in Alameda, California.

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12 /s/ Nicole E. Grigg
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